

U.S. DISTRICT COURT  
DISTRICT OF VERMONT  
FILED

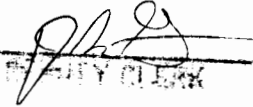
UNITED STATES DISTRICT COURT  
DISTRICT OF VERMONT

2023 MAY -5 AM 10:46

UNITED STATES OF AMERICA

v.

WILLIAM COMFORT,  
Defendant.

CLERK  
BY   
DEPUTY CLERK  
Docket No.  
2:23-cr-48

INFORMATION

The United States Attorney charges:

COUNT ONE

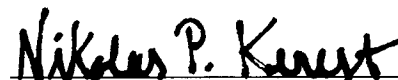
From in or about April of 2022 through in or about June of 2022, in the District of Vermont and elsewhere, the defendant, WILLIAM COMFORT, with others, known and unknown, having devised and intending to devise a scheme to defraud and to obtain money by means of false and fraudulent pretenses, representations, and promises, conspired to transmit and cause to be transmitted by means of wire communication in interstate commerce, writings, signs, signals, pictures, and sounds for the purpose of executing the scheme.

(18 U.S.C. §§ 1343, 1349)

COUNT TWO

From in or about April of 2022 through in or about June of 2022, in the District of Vermont and elsewhere, the defendant, WILLIAM COMFORT, did knowingly combine, conspire, and agree with other persons known and unknown, to commit an offense against the United States in violation of Title 18, United States Code, Section 1956, to wit: to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, that is monetary funds, knowing that the transactions were designed in whole or in part to promote the carrying on of the specified unlawful activity, namely the offense alleged in Count One, and that while conducting and attempting to conduct such financial transactions knew that the monetary funds involved in the financial transactions represented the proceeds of some form of unlawful activity.

(18 U.S.C. §§ 1956(h), 1956(a)(1)(A)(i))

A handwritten signature in black ink, reading "Nikolas P. Kerest", written over a horizontal line.

NIKOLAS P. KEREST  
United States Attorney  
Burlington, Vermont  
May 5, 2023